

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**U.S. SECURITIES AND EXCHANGE  
COMMISSION,**

**Plaintiff,**

**v.**

**VLADISLAV KLIUSHIN (a/k/a  
VLADISLAV KLYUSHIN),  
NIKOLAI RUMIANTCEV (a/k/a  
NIKOLAY RUMYANTCEV),  
MIKHAIL IRZAK,  
IGOR SLADKOV, and  
IVAN YERMAKOV (a/k/a  
IVAN ERMAKOV),**

**Defendants.**

**Case No. 1:21-cv-12088-DLC**

**PLAINTIFF’S MOTION FOR ALTERNATIVE SERVICE**

Pursuant to Rule 4(f)(3) of the Federal Rules of Civil Procedure, Plaintiff U.S. Securities and Exchange Commission (the “SEC”) respectfully moves this Court for an order authorizing it to serve the Complaint and Summons (ECF Nos. 1 and 2) by alternative means upon Defendants Nikolai Rumiantcev, a/k/a Nikolay Rumyantcev (“Rumiantcev”), Mikhail Irzak (“Irzak”), Igor Sladkov (“Sladkov”), and Ivan Yermakov, a/k/a Ivan Ermakov (“Yermakov”), by (a) email to addresses that these Defendants have used; and (b) publication in *The New York Times International Edition* for distribution in Russia, where these Defendants reside. As set forth in the memorandum of law and declaration filed herewith, these alternative means are reasonably calculated to provide these Defendants notice of the Summons and Complaint in this matter.

Dated: February 11, 2022

Respectfully submitted,

/s/ James P. Connor

David S. Mendel

James P. Connor

U.S. SECURITIES AND EXCHANGE COMMISSION

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**CERTIFICATE OF SERVICE**

Although the Defendants that are the subject of this motion have not appeared in this case, consistent with the SEC's position that the Defendants receive emails at the addresses noted in this Motion, I, James P. Connor, certify that on February 11, 2022, copies of this motion, the Memorandum in Support, the Declaration of Megan M. Bergstrom, and all attachments were sent to the Defendants at the following email addresses:

<b>Defendant</b>	<b>Email Address</b>
Nikolai Rumiantcev	<a href="mailto:nr@m13.su">nr@m13.su</a>
Mikhail Irzak	<a href="mailto:mikka777@yahoo.com">mikka777@yahoo.com</a>
Igor Sladkov	<a href="mailto:isladkov@mail.ru">isladkov@mail.ru</a>
Ivan Yermakov	<a href="mailto:i.s.ermakov@yandex.ru">i.s.ermakov@yandex.ru</a>

I further certify that on February 11, 2022, copies of this motion, the Memorandum in Support, the Declaration of Megan M. Bergstrom, and all attachments were sent to the following Defendants by United States Postal Service International Mail to the following addresses:

<b>Defendant</b>	<b>Physical Address</b>
Nikolai Rumiantcev	59 Primorskii Ave., 3, 197183, Saint Petersburg, Russian Federation
Mikhail Irzak	House 10, Flat 323 ulitsa Tatiani Makarovoy Moscow, Russian Federation
Igor Sladkov	House 31, Flat 45, Serdobolskaya Street, 197342, Saint Petersburg, Russian Federation

I further certify that on February 11, 2022, copies of this motion, the Memorandum in Support, the Declaration of Megan M. Bergstrom, and all attachments were filed using the Court's CM/ECF system, which constitutes service upon all registered ECF users, including counsel for Defendant Vladislav Kliushin.

/s/ James P. Connor  
JAMES P. CONNOR